

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (together, “Plaintiffs”). I make this declaration based upon my personal knowledge.

2. On March 20, counsel for Plaintiffs Martina Bernstein emailed counsel for Counterclaim Defendant Connie Casey (“Casey”) to request “the identity of the chimpanzees at issue and the purported new ‘owner’” referenced in Casey’s Motion for a Stay, to which Casey’s counsel Victor Essen responded, “we are requesting the information and will supplement accordingly.” Ms. Bernstein further inquired as to whether Casey would be proceeding with the agreed upon date to depose Plaintiffs’ expert Dr. Reyes-Illg next week, to which Mr. Essen responded, “We are not intending to go forward with that.” Attached hereto as **Exhibit A** is a true and correct copy of that correspondence.

3. Also on March 20, Ms. Bernstein emailed Casey's counsel to inquire as to whether they would "be able to proceed with Ms. Scott's deposition next week," and subsequently to inform them that "we are able to confirm Ms. Scott's deposition at your offices next week, March 29," requesting confirmation of the date. Mr. Essen declined to proceed on that date and, as of the time of this filing, has not proposed any other dates for Ms. Scott's deposition. Attached hereto as **Exhibit B** are a true and correct copies of that correspondence.

4. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts of the transcript of the October 29, 2018 deposition of Connie Braun Casey.

5. Attached hereto as **Exhibit D** is a true and correct copy of a sworn declaration of Gwendolen Reyes-Illg, DVM, and accompanying Exhibit A to that declaration, her written report titled "Expert Report on the Chimpanzees Held by Connie Braun Casey," produced by Plaintiffs pursuant to Federal Rule of Civil Procedure 26(a)(2).

6. Attached hereto as **Exhibit E** is a true and correct copy of a sworn declaration of Mary Lee Jensvold, Ph.D., and accompanying Exhibit A to that declaration, her written report titled "Expert Report Regarding the Chimpanzees Held at Missouri Primate Foundation," produced by Plaintiffs pursuant to Federal Rule of Civil Procedure 26(a)(2).

7. Attached hereto as **Exhibit F** is a true and correct copy of a sworn declaration of Stephen Ross, Ph.D., and accompanying Exhibit A to that declaration, his written report titled "Expert Report on the Chimpanzees in the Custody of Connie Braun Casey," produced by Plaintiffs pursuant to Federal Rule of Civil Procedure 26(a)(2).

I declare under the penalty of perjury that the foregoing is true and correct.

March 21, 2019

Los Angeles, CA

/s/ Jared Goodman
Jared Goodman